

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Case No. 1:23-cv-00369-NRM-RML

Plaintiff,

-against-

**AFFIDAVIT OF CALEB
KRUCKENBERG**

RARE BREED TRIGGERS, LLC; RARE
BREED FIREARMS, LLC; LAWRENCE
DEMONICO; KEVIN MAXWELL,


Defendants.

I, Caleb Kruckenberg, state under penalty of perjury that the following is true and correct to the best of my present knowledge, information and belief:

1. I am an attorney admitted to practice law in the State of New York, as well as the Commonwealth of Pennsylvania, the Commonwealth of Virginia and the District of Columbia.
2. I am appearing *pro hac vice* as counsel in this matter for Defendants, Rare Breed Triggers, LLC, Rare Breed Firearms, LLC, Lawrence DeMonico and Kevin Maxwell.
3. It is necessary for me and my law firm, the Pacific Legal Foundation, to immediately withdraw from this matter as counsel as Defendants and I have an irreconcilable conflict concerning the conduct of this litigation.
4. Defendants have been contacted about this request and do not oppose my or my firm's withdrawal.
5. In addition to the specific statements contained in this affidavit, if the Court seeks additional information concerning this request, I request the opportunity to present information *in camera* in a sealed proceeding.

6. Defendants have been served with a copy of this motion and affidavits.
7. Defendants request the right to be present at any *in camera* proceeding concerning this motion.
8. Defendants also request that this Court hold this matter in abeyance for 60 days, including all deadlines associated with the pending proceeding, while Defendants secure replacement counsel.
9. Defendants have informed me that they consent to an extension of the existing temporary restraining order as is necessary to provide them with such a 60-day stay of the proceedings.

Respectfully submitted May 1, 2023.



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